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John M. Fowler
Executive Director



Preserving America's Heritage

December 22, 2015

The Honorable Shaun Donovan
Director
Office of Management and Budget
725 17th Street, NW
Washington, DC 20503

Ms. Christy Goldfuss
Managing Director
Council on Environmental Quality
722 Jackson Place, NW
Washington, DC 20503

Dear Mr. Donovan and Ms. Goldfuss:

At its recent business meeting, the ACHP continued its ongoing consideration of the impacts of climate change on historic properties. Last year's report [National Landmarks at Risk](#) by the Union of Concerned Scientists highlighted the threats to America's historic properties from escalating flooding, wildfires, and coastal erosion. The recommendations of the State, Local, and Tribal Leaders Task Force on Climate Preparedness and Resilience call for federal guidance to assist state, tribal, and local governments in addressing cultural resources in their climate adaptation planning. As a member of the Council on Climate Preparedness and Resilience (Council), the ACHP has seen firsthand the important role that the Council is playing in shaping the federal government's response to climate challenges, but the Council has yet to focus on cultural resource issues. Thus, the ACHP members voted unanimously (including ten federal agency members) to call upon the Council to promote a federal leadership role in addressing the cultural heritage aspects of climate adaptation.

The ACHP sees several initial actions that the Council could take within the context of existing initiatives to encourage federal agencies to address historic properties as they implement their climate preparedness and resilience policies and programs.

- Each of the Council's working groups could be asked to address historic properties within the context of their work and report on the topic as part of their periodic reporting to the Council.
- The Climate Data and Tools Working Group could work with the ACHP and the National Park Service (NPS) to enhance access to information concerning cultural resources in the U.S. Climate Resilience Tool Kit. (NPS is leading among federal agencies in the development of studies and guidance regarding cultural resources and climate change.) The Tool Kit already includes material on cultural resources, but searching for it results in hundreds of hits. Other broad topics have been called out in explanatory topic narratives that have links to case studies and tools. A topic area should be created for cultural resources.

ADVISORY COUNCIL ON HISTORIC PRESERVATION

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- Council member agencies that are providing place-based technical assistance to communities could incorporate information on historic properties into both their training for staff and the guidance provided to communities. Those that are “embedding” staff in communities could work to ensure that local preservation agencies are included in community discussions of resilience planning and to integrate historic preservation issues into development of adaptation and resilience solutions.

- As co-chairs of the Council, CEQ and OMB could partner with the ACHP in convening a meeting of federal agency officials responsible for historic preservation policy and programs. In accordance with the National Historic Preservation Act, each agency is required to designate a preservation officer to oversee the agency’s historic preservation responsibilities. Agencies also have a requirement under Executive Order 13287 to designate a senior policy level official to have policy oversight responsibility for the agency’s historic preservation program. Assembling all of these officials could provide a key opportunity to emphasize the importance of incorporating consideration of historic properties into federal climate resilience planning.

Through these and other actions, the Council could integrate cultural resource issues into its agenda. Given the irreplaceable cultural patrimony threatened by climate change, such action is critically important.

Thank you for considering these recommendations. I would be happy to meet with you to discuss them. Please feel free to contact the ACHP’s Executive Director, John M. Fowler, at jfowler@achp.gov or at 202-517-0200.

Sincerely,



Milford Wayne Donaldson, FAIA
Chairman